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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all similarly  
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**SECOND DECLARATION OF  
ALEXANDER FRAWLEY IN SUPPORT  
OF PLAINTIFFS' MOTION TO  
EXCLUDE CERTAIN GOOGLE  
EMPLOYEE WITNESSES**

Judge: Hon. Yvonne Gonzalez Rogers  
Date: November 29, 2023  
Time: 9:00 a.m.

SECOND DECLARATION OF ALEXANDER FRAWLEY  
ISO PLAINTIFFS' MOTION TO EXCLUDE CERTAIN GOOGLE EMPLOYEE WITNESSES

Case No. 4:20-cv-03664-YGR-SVK

**SECOND DECLARATION OF ALEXANDER FRAWLEY**

I, Alexander Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice *pro hac vice* before this Court. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Second Declaration in Support of Plaintiffs' Motion to Exclude Certain Google Employee Witnesses (Dkt. 992).

3. On September 18, 2023, I sent the email attached hereto as **Exhibit 15** to counsel for Google.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 20th day of October, 2023, at New York, New York

/s/ Alexander Frawley